

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

- [1] VICTOR J. PEREZ-FERNANDEZ,
a/k/a "La Cone", "Vitu", "Vitikin",
"Enano"
Counts One through Nine
- [2] DAVID A. ISAAC-FEBUS,
a/k/a "Durant", "Davicito"
Counts One through Seven
- [3] JAN C. DALMAU-ROMAN,
a/k/a "Yankee", "El Arabe"
Counts One through Seven
- [4] CHARLIE J. DALMAU-ROMAN,
a/k/a "Tres Deos", "Tres Dedos"
Counts One through Seven
- [5] LUIS R. PEREZ-VIZCARRONDO,
a/k/a "Tio", "Raul"
Counts One through Six
- [6] SAMUEL SANTIAGO-DELGADO,
a/k/a "Kule"
Counts One through Six
- [7] MICHAEL J. GARCIA-MARQUEZ,
a/k/a "Maco", "Menor"
Counts One through Seven
- [8] LUIS N. ISAAC-SANCHEZ,
a/k/a "Chimbo", "CDobleta", "Dobleta"
Counts One through Nine
- [9] ELI Y. COUVERTIER-POLLOCK,
a/k/a "Tata", "Maike", "Maike Casiano"
Counts One through Eight
- [10] GERALD O. RODRIGUEZ-
RODRIGUEZ, a/k/a "Patron"
Counts One through Seven
- [11] ONIX Y. COUVERTIER-POLLOCK,
a/k/a "Gato", "Gatito", "Yamil"
Counts One through Eight
- [12] ANGEL L. AGOSTO-ANDINO,

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 24-453 (MAJ)

Violations:

(COUNT ONE)

Title 21, U.S.C., §§ 841(a)(1), 846 and
860.

(COUNT TWO)

Title 21, U.S.C., §§ 841(a)(1), (b)(1)(A)
and 860 and Title 18, U.S.C., § 2.

(COUNT THREE)

Title 21, U.S.C., §§ 841(a)(1), (b)(1)(A)
and 860 and Title 18, U.S.C., § 2.

(COUNT FOUR)

Title 21, U.S.C., §§ 841(a)(1), (b)(1)(A)
and 860 and Title 18, U.S.C., § 2.

(COUNT FIVE)

Title 21, U.S.C., §§ 841(a)(1), (b)(1)(B)
and 860 and Title 18, U.S.C., § 2.

(COUNT SIX)

Title 21, U.S.C., §§ 841(a)(1), (b)(1)(A)
and 860 and Title 18, U.S.C., § 2.

(COUNT SEVEN)

Title 18, U.S.C., §§ 924(c)(1)(A)(i) and
2.

(COUNT EIGHT)

Title 18, U.S.C., §§ 924(c)(1)(A)(i),
(B)(ii) and 2.

(COUNT NINE)

Title 18, U.S.C., §§ 924(j) and 2.

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US DISTRICT COURT
SAN JUAN, PR

a/k/a "Bilito", "Bartolo", "Birlito" Counts One through Six	Narcotics Forfeiture Allegation Title 21, U.S.C., § 853 and Rule 32.2(a) F.R.C.P.
[13] VICYAEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu" Counts One through Seven	Firearms and Ammunition Forfeiture Allegation Title 18, U.S.C., § 924(d)(1); Title 28 U.S.C. § 2461 (c); and Rule 32.2(a) F.R.C.P.
[14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro" Counts One through Seven	(NINE COUNTS)
[15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito" Counts One through Seven	
[16] LINO J. CALCAÑO-RODRIGUEZ, Counts One through Seven	
[17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco" Counts One through Seven	
[18] ANGEL L. SANJURJO, a/k/a "Vaca" Counts One through Seven	
[19] WILLIAM E. BORIA-ROSA, a/k/a "Boria" Counts One through Eight	
[20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui" Counts One through Six	
[21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco" Counts One through Six	
[22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala" Counts One through Seven	
[23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino" Counts One through Nine	
[24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo" Counts One through Nine	
[25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany" Counts One through Seven and Nine	
[26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz" Counts One through Eight	

- [27] JEREMY MILLAN-ISAAC,
a/k/a "Pequeño", "Zepé"
Counts One through Eight
- [28] BERNARDO DE LA CRUZ-
PIZARRO,
a/k/a "Caravela", "Armandito"
Counts One through Seven
- [29] YASIEL MORALES-LOPEZ,
a/k/a "Pausa", "Rubio"
Counts One through Eight
- [30] JOSHUA E. BULA-CARTAGENA,
a/k/a "Inquilino", "El Corista"
Counts One through Eight
- [31] JOSE A. GONZALEZ-HERRERA,
a/k/a "Teta", "Ted"
Counts One through Seven
- [32] JOSUE ISAAC-FEBUS,
a/k/a "Tonto", "Doble T"
Counts One through Seven
- [33] RAMSELL MALDONADO-TATIS,
a/k/a "R"
Counts One through Eight
- [34] JOSHUA JERIEL RIVERA-CRUZ,
a/k/a "Joshi", "J"
Counts One through Seven
- [35] JAZHIEL OCASIO-HERRERA,
a/k/a "BV"
Counts One through Eight
- [36] FRAMBEL RIJOS-HERNANDEZ,
a/k/a "Domi"
Counts One through Seven
- [37] JOSE MARTINEZ-SERRANO,
a/k/a "Tio", "Denzel"
Counts One through Seven
- [38] WILFREDO HERNANDEZ-
VIZCARRONDO, a/k/a "Machacho"
Counts One through Six
- [39] JEAN C. FERNANDEZ-GARAY,
a/k/a "Logan", "Bebo"
Counts One through Six
- [40] HAROLD REYNOSO-ISAAC,
a/k/a "Jandi", "Pichi"
Counts One through Six

- [41] CARLOS A. DELGADO-TORRES,
a/k/a "Peter", "Papi", "Papa Candela"
Counts One through Six
- [42] ISAIAS CALEB DE JESUS-
VALENTIN,
a/k/a "Minor", "Mynor", "Mynol"
Counts One through Seven
- [43] ANGEL M. FRANQUI-GONZALEZ,
a/k/a "Blanquito"
Counts One through Seven
- [44] JUAN L. TEREFORTE-BELLO,
a/k/a "Tostin"
Counts One through Six
- [45] JUSTIN LANDRAU-CIRINO,
a/k/a "Cheo"
Counts One through Six
- [46] EDGARDO D. RIVERA-RIVERA,
a/k/a "Limba"
Counts One through Six
- [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
Counts One through Seven
- [48] ALEXANDER Y. ENCARNACION-
FEBUS, a/k/a "Bebo"
Counts One through Six
- [49] KEVIN E. SOTO-PEÑA,
a/k/a "Mostri"
Counts One through Seven
- [50] JACOB J. MONGE-VIGO,
Counts One through Six
- [51] YANDER C. SANTOS-RAMOS,
a/k/a "Mingui"
Counts One through Seven
- [52] MICHAEL RODRIGUEZ-SEIB,
a/k/a "Teco"
Counts One through Seven
- [53] VICTOR Z. SIFONTE-RIVERA,
Counts One through Six
- [54] EDUARDO A. TOLENTINO-
MELENDEZ,
Counts One through Six
- [55] FERNANDO TORRES-GALARZA,
a/k/a "Perro"
Counts One through Six

[56] DESTINY CRESPO-CORREA,
Counts One through Six

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. §§ 841(a)(1) & (b)(1)(A), 846 & 860

(Conspiracy to Possess with Intent to Distribute/Distribution of Controlled Substances)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and areas nearby, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [2] DAVID A. ISAAC-FEBUS, a/k/a “Durant”, “Davictito”
- [3] JAN C. DALMAU-ROMAN, a/k/a “Yankee”, “El Arabe”
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a “Tres Deos”, “Tres Dedos”
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a “Tio”, “Raul”
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a “Kule”
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a “Maco”, “Menor”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a “Tata”, “Maike”, “Maike Casiano”
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a “Patron”
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a “Gato”, “Gatito”, “Yamil”
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a “Bilito”, “Bartolo”, “Birlito”
- [13] VICY AEL C. HERNANDEZ-DIAZ, a/k/a “Menor”, “Ozu”
- [14] PAUL W. HERRERA-RIVERA, a/k/a “Polito”, “Agua Sucia”, “Negro”
- [15] LUIS R. PEREZ-COLON, a/k/a “Mencho”, “Luisito”
- [16] LINO J. CALCAÑO-RODRIGUEZ
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- [18] ANGEL L. SANJURJO, a/k/a “Vaca”
- [19] WILLIAM E. BORIA-ROSA, a/k/a “Boria”
- [20] CHRISTIAN LUNA-ILARRAZA, a/k/a “Chiqui”
- [21] CARLOS F. MERCADO-MOLINA, a/k/a “Blanco Perla”, “Payco”
- [22] ORLANDO RESTO-GARCIA, a/k/a “Luli”, “Potala”
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a “Martino”
- [24] OLVIN O’NEILL-CONCEPCION-TAPIA, a/k/a “Sinfo”
- [25] DANIEL J. LOPEZ-VEGA, a/k/a “Dany”

- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
- [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
- [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
- [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
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- [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"
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- [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
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- [53] VICTOR Z. SIFONTE-RIVERA
- [54] EDUARDO A. TOLENTINO-MELENDEZ
- [55] FERNANDO TORRES-GALARZA, a/k/a "Perro" and
- [56] DESTINY CRESPO-CORREA

the defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, to wit: one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin,

a Schedule I Narcotic Drug Controlled Substance; four hundred (400) grams or more of a mixture or a substance containing a detectable amount of N-(1-(2-phenethyl)-4-piperidinyl-N-phenyl-propanamide (fentanyl), a Schedule II Narcotic Drug Controlled Substance; two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I, Controlled Substance; a mixture or substance containing a detectable amount of Clonazepam, a Schedule IV, Controlled Substance, a mixture or substance containing a detectable amount of Oxycodone (commonly known as Percocet), a Schedule II Controlled Substance; and a mixture or substance containing a detectable amount of Alprazolam (commonly known as Xanax), all within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is, the Sabana Abajo Public Housing Project (“PHP”), Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

I. THE ALLIANCE

In or about 2021, drug trafficking organizations operating in and around the areas of Carolina, San Juan and other areas, including but not limited to the Sabana Abajo Public Housing Project (known as El Doble or El Doble Castillo), Luis Llorens

Torres PHP (known together as Los Diablos); the Los Mirtos PHP (known as Los Caima or Los Caimanes), Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, the Jardines de Monte Hatillo PHP (known together as La Familia Carolina “LFC”); and other areas nearby (hereinafter The Alliance) reached an agreement to conduct their drug trafficking operations as allies, which they referred to as “La Paz” (The Peace). At this time, each housing project organization was controlled by their own leadership and structure. As part of the agreement or the alliance, there would not be war between these organizations and members would be able to rely on each other for protection, drugs, and weapons. After the alliance was formed, each housing project or group of housing projects retained their own leadership structure. Members of the alliance would conduct meetings and would frequent each other’s housing projects and the same bars and clubs together. Most times, only members of the alliance would be allowed to be armed at these locations, including public bars and clubs. Members of the alliance would also perform in concerts and music videos together, recording videos at each other’s housing projects using real weapons to project their alliance’s power. Members would identify their gang affiliation with jewelry such as pendants allusive to their housing project, organization or names of record labels, including, but not limited to, “LFC” (La Familia Carolina), “LMM” (Loyalty Music Money) and “LMG” (Loyalty Music Group).

II. OBJECT OF THE CONSPIRACY

The goal of the alliance was to operate a violent drug-trafficking organization to distribute controlled substances in the Municipalities of Carolina, San Juan, and

areas nearby, all for significant financial gain and profit. Members of the alliance would also engage in the business of trafficking illegal firearms. The goal of the alliance was to maintain control of all the drug trafficking activities within the controlled areas by the use of force, threats, violence and intimidation. In preserving power and protecting territory, the members of the alliance would profit from the illegal distribution of narcotics and the trafficking of illegal firearms. When members of the alliance perceived threats to the organization and/or its members they would engage in violent acts including, but not limited to, murder to protect themselves and their organization. Members of the alliance would also transport and distribute kilogram quantities of cocaine from Puerto Rico into the continental United States.

III. MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the objects of the conspiracy included, among other things, the following:

A. THE OPERATION OF DRUG POINTS

1. Defendants and their co-conspirators would operate several drug points out of different housing projects and wards in and near Carolina and San Juan, Puerto Rico.
2. Defendants and their co-conspirators would sell street quantity amounts of heroin, fentanyl, cocaine base (“crack”), cocaine, pills, and marijuana at the drug distribution points.
3. Defendants and their co-conspirators would sell the heroin, fentanyl,

cocaine base (“crack”), cocaine, pills, and marijuana in small baggies, vials, decks, or other packaging used for street sale at the drug distribution points.

4. Defendants and their co-conspirators would package controlled substances for later distribution at the drug points.

5. Defendants and their co-conspirators would receive heroin, fentanyl, cocaine, cocaine base (“crack”), pills and marijuana already packaged for street sale distribution at the drug points.

6. Defendants and their co-conspirators would use residences or apartments to “work” the “table”, which is the process of preparing, cutting, and decking the narcotics to be sold at the drug distribution points. At times, Defendants and their co-conspirators would also use abandoned residences or apartments to process and prepare narcotics.

7. Defendants and their co-conspirators would use residences and/or apartments to stash controlled substances, firearms, ammunition, magazines, drug paraphernalia and other items to further their criminal activities.

8. Defendants and their co-conspirators would use two-way radios (“walkie-talkies” referred to as scanners) and cellular phones to communicate and alert other members of the organization of the presence of law enforcement agents or members of rival gangs and to discuss among themselves the operations of the drug distribution points.

9. Defendants and their co-conspirator would use cellular phones, including messaging apps and social media platforms and other communication devices to

further their drug trafficking and illegal firearms trafficking activities.

10. Defendants and their co-conspirators would use two-way radios during violent incidents, to gain strategic advantages over law enforcement and rival gangs.

11. Defendants and their Co-conspirators would keep other members of the organization informed of the movements of law enforcement agents and perceived enemies by using two-way radios to keep other members informed of what was happening and to give instructions.

12. Defendants and their co-conspirators would keep each other informed of their activities, plans, future transactions, and would share information about drug trafficking activities and violent acts with the purpose of avoiding detection and ensuring the success of their criminal venture.

13. Defendants and their co-conspirators would engage in the trafficking of illegal firearms and ammunition using their social media accounts and other social media applications and platforms.

14. Defendants and their co-conspirators would obtain lawful use and carry permits to facilitate the acquisition of ammunition which at times was distributed among members of the organization.

15. Defendants and their co-conspirators with lawful use and carry permits would trade weapons amongst themselves with the purpose of furthering their drug trafficking activities.

16. Defendants and their co-conspirators with lawful use and carry permits would possess weapons to further the criminal enterprise, including illegally purchased

weapons such as machineguns.

17. Defendants and their co-conspirators would use photos, social media posts and videos, including, but not limited to, music videos, which would be posted to various social media platforms to display their association, power and control over their areas of control. While creating this content defendants and their co-conspirators would possess real firearms and ammunition as a display of power and intimidation to rival gang members.

18. Defendants and their co-conspirators would use different gang signs, emblems, and jewelry to promote their music and their gang affiliation.

19. Defendants and their co-conspirators would obtain information from corrupt police officers to surveil rival gang members and to avoid law enforcement detection.

20. Defendants and their co-conspirators would have corrupt police officers access law enforcement databases to obtain privileged information such as vehicle registration data and personal identifying data.

21. Defendants and their co-conspirators would protect themselves and each other from prosecution by advising each other to provide false statements and providing false statements to law enforcement when questioned by the police in relation to crimes committed by gang members, and by taking retribution against those that cooperated with the authorities.

B. THE ESTABLISHMENT OF A HIERARCHY

22. Defendants and their co-conspirators would act in different roles to

further the goals of the conspiracy, to wit: leaders, suppliers, drug point owners, enforcers, runners, sellers, lookouts, and facilitators.

23. Defendants and their co-conspirators would have meetings to discuss strategy and plan of their criminal activities, including, but not limited to, acts of violence.

24. Defendants and their co-conspirators would hold meetings at different locations, including but not limited to the Jardines de Monte Hatillo PHP, Los Mirtos PHP and Sabana Abajo PHP to discuss drug trafficking business and issues between gang members. For these meetings, each PHP would send their representatives to participate on behalf of their PHP.

25. Defendants and their co-conspirators would support the drug trafficking operations of each housing project by providing access to drugs, firearms, and protection whenever the need arose.

C. THE THREATENED AND ACTUAL USE OF VIOLENCE

26. Defendants and their co-conspirators would use intimidation, force, and violence to maintain control of the drug trafficking operations, intimidate rival drug trafficking organizations, and discipline members of their own drug trafficking organization.

27. Defendants and their co-conspirators would participate in murders and shootings to further their drug trafficking operations.

28. Defendants and their co-conspirators would use violence to take over other areas to sell their own narcotics at those areas to increase their power and profits.

D. AVOIDANCE OF DETECTION BY LAW ENFORCEMENT

29. Defendants and their co-conspirators would take actions to attempt to avoid detection of their illicit activities by law enforcement.

30. Defendants and their co-conspirators would often use stolen cars to carry out acts of violence so the cars could not be traced back to them.

31. Defendants and their co-conspirators would have a corrupt Puerto Rico police officer run license plates of vehicles that the organization believed to be used by the police or members of rival gangs to conduct surveillance on members of the conspiracy. They would also have the Puerto Rico police officer run license plates of vehicles to be acquired by members of the organization to avoid detection by law enforcement.

32. Defendants and their co-conspirators would often use masks and black clothing to commit acts of violence and avoid detection by law enforcement or rival gang members.

33. Defendants and their co-conspirators would often purchase cars, motorcycles, and all-terrain vehicles (ATVs) and would not register them in their names.

34. Defendants and their co-conspirators would use coded words when referring to the names of their housing projects and areas, the controlled substances they distributed, firearms, each other, and other items relating to the activities of the DTO.

35. Defendants and their co-conspirators would hide, sell, and otherwise

dispose of firearms, narcotics and other items related to the activities of the DTO so that law enforcement officers would not find those items and trace them back to the members of the DTO.

36. Defendants and their co-conspirators would ask others to lie to law enforcement to shield them from police investigations. Defendants and their co-conspirators would obtain information about who they perceived to be cooperating with law enforcement and would distribute this information among the other members of the gang.

37. Defendants and their co-conspirators would ask each other to move drugs or firearms for them if law enforcement was detected in the area.

38. Defendants and their co-conspirators would ask others to hide them in vehicles to get them out of the housing projects during law enforcement operations.

E. THE POSSESSION AND USE OF FIREARMS

39. Defendants and their co-conspirators would routinely possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization. At different points during the conspiracy, the leaders of the organization would provide the members of the organization with different types of firearms, pistols and “high powered” rifles, to protect themselves, the narcotics and their profits from rival gang members.

40. Defendants and their co-conspirators would modify or alter pistols and “high powered” rifles to convert them to automatic weapons (machineguns).

41. Defendants and their co-conspirators would legally and illegally purchase

firearms and then sell them to other members of the drug trafficking organization.

42. Defendants and their co-conspirators would stash firearms and ammunition in strategic locations within the housing projects to have quick access to them in any situation or perceived threat against members of the organization.

43. Defendants and their co-conspirators would sell or transfer their firearms to other members of the drug trafficking organization to protect themselves, the narcotics, and the proceeds derived from the sales.

44. Defendants and their co-conspirators would sometimes use machineguns in the above-listed activities.

IV. ROLES OF THE MEMBERS OF THE CONSPIRACY

45. Leaders controlled and supervised the drug trafficking operations at the drug distribution points located within the Sabana Abajo PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, Luis Llorens Torres PHP and other housing projects and wards within the municipalities of Carolina, San Juan and other areas nearby. During the span of the conspiracy, leaders purchased kilogram quantities of narcotics and oversaw the sale of such narcotics at the drug distribution points. They would receive proceeds from the sale of controlled substances distributed at the drug distribution points. Some of the leaders of the organization would also oversee the transportation and distribution of kilogram quantities of cocaine to the continental United States and would derive profits from those drug trafficking activities. Additionally, leaders would perform or carry out several acts within the conspiracy including, but not limited to, supplying

narcotics, firearms and ammunition to the DTO and/or drug distribution points. At various times during the course of the conspiracy, leaders purchased firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities. Leaders would also possess firearms in furtherance of the drug trafficking activities of the organization. They would conduct meetings to resolve issues, give instructions and discuss items of interest to The Alliance.

46. Drug point owners would receive the profits from the sale of the controlled substance(s) they owned. Drug point owners would also sometimes act as leaders. Drug point owners were responsible for determining the price of the controlled substance(s). They were also responsible for giving instructions to other members of The Alliance. They would conduct meetings to resolve issues, give instructions, and discuss items of interest to The Alliance.

47. Enforcers would possess, carry, brandish, use, and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, and the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders and drug point owners of the alliance. Enforcers would often provide protection to the drug trafficking organization's drug-distribution points. Enforcers would sometimes participate in acts of violence, including murders.

48. Suppliers would obtain wholesale quantities of controlled substances and would distribute them to members of The Alliance.

49. Runners worked under the supervision of the leaders and drug point owners of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug points. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift at the drug points. At various times, they would be responsible for recruiting street sellers and additional runners. The runners would also supervise the sellers and the daily activities at the drug points.

50. Sellers would distribute street quantity amounts of heroin, fentanyl, crack cocaine, cocaine, pills, and marijuana. As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug-distribution points. Sellers would sometimes sell while wearing a mask and/or gloves.

51. Drug processors would package controlled substances for sale at the drug point. A member of the alliance would deliver controlled substances to the drug processor and the drug processor would take the large amounts of controlled substances and put them into “baggies” or “vials” or “decks” or some other packaging so they could be sold at the drug point. Drug processors would often “cut” the controlled substances with other substances—sometimes a controlled substance and sometimes a non-controlled substance. Drug processors would also, on occasion, take controlled substances to the drug point and/or retrieve money from the drug point.

52. Lookouts would be at strategic locations to observe who was getting close to the drug point. If a lookout saw police or someone who could be an enemy they

would so indicate over the two-way radios (“walkie-talkies” / “scanners”) to other members of The Alliance to allow the other members to respond to the situation.

53. Some lookouts would also conduct surveillance for leaders of the DTO at their homes outside of the public housing projects. They would use home security cameras and would advise if law enforcement or potential rivals were in the area.

54. Members of The Alliance would sometimes act in more than one of the above-named roles and would also perform other functions as needed.

All in violation of Title 21, U.S.C., §§ 846, 841(a)(1) and (b)(1)(A), and 860.

COUNT TWO

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession/Distribution of Heroin)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [2] DAVID A. ISAAC-FEBUS, a/k/a “Durant”, “Davicitos”
- [3] JAN C. DALMAU-ROMAN, a/k/a “Yankee”, “El Arabe”
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a “Tres Deos”, “Tres Dedos”
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a “Tio”, “Raul”
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a “Kule”
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a “Maco”, “Menor”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a “Tata”, “Maike”, “Maike Casiano”
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a “Patron”
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a “Gato”, “Gatito”, “Yamil”
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a “Bilito”, “Bartolo”, “Birlito”
- [13] VICY AEL C. HERNANDEZ-DIAZ, a/k/a “Menor”, “Ozu”
- [14] PAUL W. HERRERA-RIVERA, a/k/a “Polito”, “Agua Sucia”, “Negro”
- [15] LUIS R. PEREZ-COLON, a/k/a “Mencho”, “Luisito”
- [16] LINO J. CALCAÑO-RODRIGUEZ

- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
 - [18] ANGEL L. SANJURJO, a/k/a "Vaca"
 - [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
 - [20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui"
 - [21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco"
 - [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
 - [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
 - [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
 - [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
 - [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
 - [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
 - [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
 - [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
 - [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
 - [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
 - [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
 - [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
 - [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
 - [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
 - [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
 - [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
 - [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
 - [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
 - [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
 - [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
 - [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
 - [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
 - [44] JUAN L. TEREFORTE-BELLO, a/k/a "Tostin"
 - [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"
 - [46] EDGARDO D. RIVERA-RIVERA, a/k/a "Limba"
 - [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
 - [48] ALEXANDER Y. ENCARNACION-FEBUS, a/k/a "Bebo"
 - [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
 - [50] JACOB J. MONGE-VIGO
 - [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
 - [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"
 - [53] VICTOR Z. SIFONTE-RIVERA
 - [54] EDUARDO A. TOLENTINO-MELENDEZ
 - [55] FERNANDO TORRES-GALARZA, a/k/a "Perro" and
 - [56] DESTINY CRESPO-CORREA
- the defendants herein, aiding and abetting one another, did knowingly and

intentionally, possess with intent to distribute, and distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Sabana Abajo PHP, Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

All in violation of Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(A) and 860 and Title 18, U.S.C., § 2.

COUNT THREE

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(*Possession/Distribution of Cocaine Base*)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [2] DAVID A. ISAAC-FEBUS, a/k/a “Durant”, “Davicitto”
- [3] JAN C. DALMAU-ROMAN, a/k/a “Yankee”, “El Arabe”
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a “Tres Deos”, “Tres Dedos”
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a “Tio”, “Raul”
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a “Kule”
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a “Maco”, “Menor”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a “Tata”, “Maike”, “Maike Casiano”
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a “Patron”
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a “Gato”, “Gatito”, “Yamil”
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a “Bilito”, “Bartolo”, “Birlito”

- [13] VICYAEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui"
- [21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
- [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
- [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
- [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [44] JUAN L. TEREFORTE-BELLO, a/k/a "Tostin"
- [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"
- [46] EDGARDO D. RIVERA-RIVERA, a/k/a "Limba"
- [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
- [48] ALEXANDER Y. ENCARNACION-FEBUS, a/k/a "Bebo"
- [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
- [50] JACOB J. MONGE-VIGO
- [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
- [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"
- [53] VICTOR Z. SIFONTE-RIVERA
- [54] EDUARDO A. TOLENTINO-MELENDEZ

[55] FERNANDO TORRES-GALARZA, a/k/a “Perro” and
 [56] DESTINY CRESPO-CORREA

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute and distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Sabana Abajo PHP, Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

All in violation of Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(A) and 860 and Title 18, U.S.C., § 2.

COUNT FOUR

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession/Distribution of Cocaine)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [2] DAVID A. ISAAC-FEBUS, a/k/a “Durant”, “Davicitto”
- [3] JAN C. DALMAU-ROMAN, a/k/a “Yankee”, “El Arabe”
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a “Tres Deos”, “Tres Dedos”
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a “Tio”, “Raul”
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a “Kule”
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a “Maco”, “Menor”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a “Tata”, “Maike”, “Maike Casiano”

- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a "Patron"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a "Bilito", "Bartolo", "Birlito"
- [13] VICY AEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui"
- [21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
- [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
- [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
- [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [44] JUAN L. TEREFORTE-BELLO, a/k/a "Tostin"
- [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"
- [46] EDGARDO D. RIVERA-RIVERA, a/k/a "Limba"
- [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
- [48] ALEXANDER Y. ENCARNACION-FEBUS, a/k/a "Bebo"
- [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
- [50] JACOB J. MONGE-VIGO
- [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"

[52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"
 [53] VICTOR Z. SIFONTE-RIVERA
 [54] EDUARDO A. TOLENTINO-MELENDEZ
 [55] FERNANDO TORRES-GALARZA, a/k/a "Perro" and
 [56] DESTINY CRESPO-CORREA

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute and distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Sabana Abajo PHP, Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

All in violation of Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(A) and 860 and Title 18, U.S.C., § 2.

COUNT FIVE

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession/Distribution of Marijuana)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a "La Cone", "Vitu", "Vitikin", "Enano"
- [2] DAVID A. ISAAC-FEBUS, a/k/a "Durant", "Davicitto"
- [3] JAN C. DALMAU-ROMAN, a/k/a "Yankee", "El Arabe"
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a "Tres Deos", "Tres Dedos"
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a "Tio", "Raul"
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a "Kule"

- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a "Maco", "Menor"
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a "Chimbo", "CDobleta", "Dobleta"
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a "Tata", "Maike", "Maike Casiano"
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a "Patron"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a "Bilito", "Bartolo", "Birlito"
- [13] VICYAEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui"
- [21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
- [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
- [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
- [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [44] JUAN L. TEREFORTE-BELLO, a/k/a "Tostin"
- [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"
- [46] EDGARDO D. RIVERA-RIVERA, a/k/a "Limba"
- [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
- [48] ALEXANDER Y. ENCARNACION-FEBUS, a/k/a "Bebo"

- [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
- [50] JACOB J. MONGE-VIGO
- [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
- [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"
- [53] VICTOR Z. SIFONTE-RIVERA
- [54] EDUARDO A. TOLENTINO-MELENDEZ
- [55] FERNANDO TORRES-GALARZA, a/k/a "Perro" and
- [56] DESTINY CRESPO-CORREA

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute and distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Sabana Abajo PHP, Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

All in violation of Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(B) and 860 and Title 18, U.S.C., § 2.

COUNT SIX

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession/Distribution of Fentanyl)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a "La Cone", "Vitu", "Vitikin", "Enano"
- [2] DAVID A. ISAAC-FEBUS, a/k/a "Durant", "Davicito"
- [3] JAN C. DALMAU-ROMAN, a/k/a "Yankee", "El Arabe"

- [4] CHARLIE J. DALMAU-ROMAN, a/k/a "Tres Deos", "Tres Dedos"
- [5] LUIS R. PEREZ-VIZCARRONDO, a/k/a "Tio", "Raul"
- [6] SAMUEL SANTIAGO-DELGADO, a/k/a "Kule"
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a "Maco", "Menor"
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a "Chimbo", "CDobleta", "Dobleta"
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a "Tata", "Maike", "Maike Casiano"
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a "Patron"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [12] ANGEL L. AGOSTO-ANDINO, a/k/a "Bilito", "Bartolo", "Birlito"
- [13] VICYAEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [20] CHRISTIAN LUNA-ILARRAZA, a/k/a "Chiqui"
- [21] CARLOS F. MERCADO-MOLINA, a/k/a "Blanco Perla", "Payco"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [38] WILFREDO HERNANDEZ-VIZCARRONDO, a/k/a "Machacho"
- [39] JEAN C. FERNANDEZ-GARAY, a/k/a "Logan", "Bebo"
- [40] HAROLD REYNOSO-ISAAC, a/k/a "Jandi", "Pichi"
- [41] CARLOS A. DELGADO-TORRES, a/k/a "Peter", "Papi", "Papa Candela"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [44] JUAN L. TEREFORTE-BELLO, a/k/a "Tostin"
- [45] JUSTIN LANDRAU-CIRINO, a/k/a "Cheo"

[46] EDGARDO D. RIVERA-RIVERA, a/k/a "Limba"
 [47] DANNY DIAZ-SOTO, a/k/a "Shorty"
 [48] ALEXANDER Y. ENCARNACION-FEBUS, a/k/a "Bebo"
 [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
 [50] JACOB J. MONGE-VIGO
 [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
 [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"
 [53] VICTOR Z. SIFONTE-RIVERA
 [54] EDUARDO A. TOLENTINO-MELENDEZ
 [55] FERNANDO TORRES-GALARZA, a/k/a "Perro" and
 [56] DESTINY CRESPO-CORREA

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute and distribute four hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4piperidinyl] propanamide or 100 grams or more of a mixture or substance containing a detectable amount of any analogue N-phenyl-N-[1-(2-phenylethyl)-4piperidinyl] propanamide, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real properties comprising housing facilities owned by a public housing authority, that is the Sabana Abajo PHP, Luis Llorens Torres PHP, Los Mirtos PHP, Lagos de Blasina PHP, La Esmeralda PHP, El Coral PHP, Jardines de Monte Hatillo PHP, and other areas nearby.

All in violation of Title 21, U.S.C., §§ 841(a)(1) and (b)(1)(A) and 860 and Title 18, U.S.C., § 2.

COUNT SEVEN
 18 U.S.C. §§ 924(c)(1)(A) & 2
(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas

nearby in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a "La Cone", "Vitu", "Vitikin", "Enano"
- [2] DAVID A. ISAAC-FEBUS, a/k/a "Durant", "Davicitos"
- [3] JAN C. DALMAU-ROMAN, a/k/a "Yankee", "El Arabe"
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a "Tres Deos", "Tres Dedos"
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a "Maco", "Menor"
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a "Chimbo", "CDobleta", "Dobleta"
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a "Tata", "Maike", "Maike Casiano"
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a "Patron"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [13] VICY AEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
- [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
- [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"

the defendants herein, adding and abetting one another, did knowingly and unlawfully possess firearms, of unknown make and caliber, as that term is defined in Title 18, U.S.C., §§ 921(a)(3), in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States: that is, conspiracy to possess controlled substances and possession with intent to distribute controlled substances as charged in Counts One through Six of this Indictment, pursuant to Title 21, U.S.C., §§ 841(a)(1), 846 and 860.

All in violation of Title 18, U.S.C., § 924(c)(1)(A) and 2.

COUNT EIGHT

18 U.S.C. § 924(c)(1)(A) & (B)(ii) & § 2

(Possession of a Machinegun in Furtherance of a Drug Trafficking Crime)

From in or about 2021, and continuing up to and until the date of the return of the instant Indictment, in the Municipalities of Carolina, San Juan and other areas nearby in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a “Tata”, “Maike”, “Maike Casiano”
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a “Gato”, “Gatito”, “Yamil”
- [19] WILLIAM E. BORIA-ROSA, a/k/a “Boria”
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a “Martino”
- [24] OLVIN O’NEILL-CONCEPCION-TAPIA, a/k/a “Sinfo”
- [25] DANIEL J. LOPEZ-VEGA, a/k/a “Dany”
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a “Chizguis”, “Pelicula”, “Cheese Wiz”
- [27] JEREMY MILLAN-ISAAC, a/k/a “Pequeño”, “Zepe”
- [29] YASIEL MORALES-LOPEZ, a/k/a “Pausa”, “Rubio”
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a “Inquilino”, “El Corista”
- [33] RAMSELL MALDONADO-TATIS, a/k/a “R” and
- [35] JAZHIEL OCASIO-HERRERA, a/k/a “BV”

the defendants herein, aiding and abetting one another, did knowingly and unlawfully possess firearms, of known and unknown makes and calibers, modified to fire automatically more than one shot, without manual reloading, by a single function of the trigger, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is conspiracy to possess controlled substances and possession with intent to distribute controlled substances as charged in Counts One through Six of this Indictment, pursuant to Title 21, U.S.C., §§ 841(a)(1), 846 and 860.

All in violation of Title 18, U.S.C., §§ 924(c)(1)(A) & (B)(ii) and 2.

COUNT NINE

18 U.S.C. § 924(j) and 18 U.S.C. § 2.
(Firearm-Related Murder)

On or about 29 March 2024, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a “La Cone”, “Vitu”, “Vitikin”, “Enano”
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a “Chimbo”, “CDobleta”, “Dobleta”
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a “Martino”
- [24] OLVIN O’NEILL-CONCEPCION-TAPIA, a/k/a “Sinfo” and
- [25] DANIEL J. LOPEZ-VEGA, a/k/a “Dany”

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting one another, did knowingly use and carry firearm(s), as defined in Title 18, U.S.C., § 921(a)(3), that is, a firearm(s) of unknown brand, caliber, and serial number, during and in relation to a drug trafficking crime, as that term is defined in 18 U.S.C. § 924(c)(2), for which they may be prosecuted in a court of the United States, to wit, violations of Title 21, U.S.C., §§ 841(a)(1), 846 and 860, as charged in Counts One

through Six of the Indictment, which are realleged and incorporated by reference herein, and in the course of that crime, the defendants did cause the death of E.R.V. through the use of a firearm, which killing is defined as a murder in Title 18, U.S.C., § 1111.

All in violation of Title 18, U.S.C., §§ 924(j)(1) and 2.

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NARCOTICS FORFEITURE ALLEGATION

21 U.S.C. § 853(a)(1) and (2)

1. The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, U.S.C., § 853.

2. Pursuant to Title 21, U.S.C., § 853, upon conviction of an offense in violation of Title 21, U.S.C., § 846, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following: A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: \$10,944,664.00 in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, U.S.C., § 853(p).

FIREARMS AND AMMUNITION FORFEITURE ALLEGATION

18 U.S.C. § 924(d)(1) & 28 U.S.C. § 2461(c)

1. The allegations contained in Counts One through Seven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, U.S.C., § 924(d) and Title 28, U.S.C., § 2461(c).

2. Upon conviction of the offenses in violation of Title 18, U.S.C., § 924(c), set forth in Count Seven of this Indictment, the defendants,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a "La Cone", "Vitu", "Vitikin", "Enano"
- [2] DAVID A. ISAAC-FEBUS, a/k/a "Durant", "Davicito"
- [3] JAN C. DALMAU-ROMAN, a/k/a "Yankee", "El Arabe"
- [4] CHARLIE J. DALMAU-ROMAN, a/k/a "Tres Deos", "Tres Dedos"
- [7] MICHAEL J. GARCIA-MARQUEZ, a/k/a "Maco", "Menor"
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a "Chimbo", "CDobleta", "Dobleta"
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a "Tata", "Maike", "Maike Casiano"
- [10] GERALD O. RODRIGUEZ-RODRIGUEZ, a/k/a "Patron"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [13] VICYUEL C. HERNANDEZ-DIAZ, a/k/a "Menor", "Ozu"
- [14] PAUL W. HERRERA-RIVERA, a/k/a "Polito", "Agua Sucia", "Negro"
- [15] LUIS R. PEREZ-COLON, a/k/a "Mencho", "Luisito"
- [16] LINO J. CALCAÑO-RODRIGUEZ
- [17] EDDIE G. ROQUE-SANCHEZ, a/k/a "Edito", "Coco"
- [18] ANGEL L. SANJURJO, a/k/a "Vaca"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [22] ORLANDO RESTO-GARCIA, a/k/a "Luli", "Potala"

- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"
- [27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepe"
- [28] BERNARDO DE LA CRUZ-PIZARRO, a/k/a "Caravela", "Armandito"
- [29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
- [30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
- [31] JOSE A. GONZALEZ-HERRERA, a/k/a "Teta", "Ted"
- [32] JOSUE ISAAC-FEBUS, a/k/a "Tonto", "Doble T"
- [33] RAMSELL MALDONADO-TATIS, a/k/a "R"
- [34] JOSHUA JERIEL RIVERA-CRUZ, a/k/a "Joshi", "J"
- [35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"
- [36] FRAMBEL RIJOS-HERNANDEZ, a/k/a "Domi"
- [37] JOSE MARTINEZ-SERRANO, a/k/a "Tio", "Denzel"
- [42] ISAIAS CALEB DE JESUS-VALENTIN, a/k/a "Minor", "Mynor", "Mynol"
- [43] ANGEL M. FRANQUI-GONZALEZ, a/k/a "Blanquito"
- [49] KEVIN E. SOTO-PEÑA, a/k/a "Mostri"
- [51] YANDER C. SANTOS-RAMOS, a/k/a "Mingui"
- [52] MICHAEL RODRIGUEZ-SEIB, a/k/a "Teco"

shall forfeit to the United States pursuant to Title 18, U.S.C., § 924(d) and Title 28, U.S.C., § 2461(c) any firearms and ammunition involved or used in the commission of the offense.

3. Upon conviction of the offenses in violation of Title 18, U.S.C., § 924(c), as set forth in Count Eight of this Indictment, the defendants,

- [1] VICTOR J. PEREZ-FERNANDEZ, a/k/a "La Cone", "Vitu", "Vitikin", "Enano"
- [8] LUIS N. ISAAC-SANCHEZ, a/k/a "Chimbo", "CDobleta", "Dobleta"
- [9] ELI Y. COUVERTIER-POLLOCK, a/k/a "Tata", "Maike", "Maike Casiano"
- [11] ONIX Y. COUVERTIER-POLLOCK, a/k/a "Gato", "Gatito", "Yamil"
- [19] WILLIAM E. BORIA-ROSA, a/k/a "Boria"
- [23] ANDYEL GONZALEZ-SAEZ, a/k/a "Martino"
- [24] OLVIN O'NEILL-CONCEPCION-TAPIA, a/k/a "Sinfo"
- [25] DANIEL J. LOPEZ-VEGA, a/k/a "Dany"
- [26] EDWIN Y. FLORES-TAVAREZ, a/k/a "Chizguis", "Película", "Cheese Wiz"

[27] JEREMY MILLAN-ISAAC, a/k/a "Pequeño", "Zepé"
[29] YASIEL MORALES-LOPEZ, a/k/a "Pausa", "Rubio"
[30] JOSHUA E. BULA-CARTAGENA, a/k/a "Inquilino", "El Corista"
[33] RAMSELL MALDONADO-TATIS, a/k/a "R" and
[35] JAZHIEL OCASIO-HERRERA, a/k/a "BV"

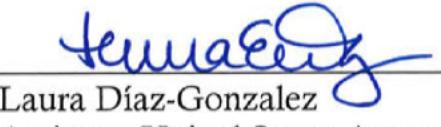
shall forfeit to the United States pursuant to Title 18, U.S.C., § 924(d) and Title 28, U.S.C., § 2461(c) any firearms and ammunition involved or used in the commission of the offense.

All pursuant to Title 18, U.S.C., § 924(d) and Title 28, U.S.C., § 2461(c).

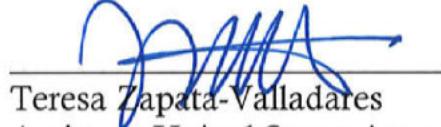
FOREPERSON
Date: 12/05/2024

W. STEPHEN MULDROW
United States Attorney


Alberto R. López-Rocafort
Assistant United States Attorney
Chief, Gang Division


Laura Díaz-Gonzalez
Assistant United States Attorney


Joseph Russell
Assistant United States Attorney


Teresa Zapata-Valladares
Assistant United States Attorney
Deputy Chief, Gang Section


R. Vance Eaton
Assistant United States Attorney